

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

PUBLIC EMPLOYEES' RETIREMENT
SYSTEM OF MISSISSIPPI, on behalf of itself
and all others similarly situated,

Plaintiff,

v.

MYLAN N.V., HEATHER BRESCH, RAJIV
MALIK, ANTHONY MAURO, and KENNETH
PARKS,

Defendants.

Case No. 2:20-cv-00955-NR

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO COMPLAINT**

WHEREAS, on June 26, 2020, plaintiff Public Employees' Retirement System of Mississippi ("Plaintiff") filed a class action complaint in the above-captioned action (the "Complaint") against defendants Mylan N.V. ("Mylan"), Heather Bresch, Rajiv Malik, Anthony Mauro, and Kenneth Parks (the "Individual Defendants") (collectively with Mylan, "Defendants," and together with Plaintiff, the "Parties");

WHEREAS, the undersigned counsel for Defendants have been authorized and hereby do accept service on behalf of the Defendants;

WHEREAS, the action asserts claims for relief under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78j(b) and 78t(a), and is accordingly governed by the Private Securities Litigation Reform Act of 1995 (the "PSLRA") and its procedures for the appointment of lead plaintiff and lead counsel, 15 U.S.C. § 78u-4(a)(3);

WHEREAS, pursuant to the PSLRA, 15 U.S.C. § 78u-4(a)(3)(A)(i), on June 26, 2020, Plaintiff's counsel published notice alerting investors to the pendency of the above-captioned action and the August 25, 2020 deadline for seeking appointment as lead plaintiff;

WHEREAS, pursuant to the PSLRA, the Court will appoint as lead plaintiff the person or group of persons who are members of the proposed class that the Court determines to be "most capable of adequately representing the interests of class members," 15 U.S.C. § 78u-4(a)(3)(B)(i)-(ii);

WHEREAS, once the lead plaintiff and lead counsel are appointed, an operative complaint will be identified, or an amended or consolidated complaint will be filed, which will become the operative complaint;

WHEREAS, the Parties have not previously requested or received time for an extension to answer or otherwise respond to the Complaint in this action;

WHEREAS, the Parties agree that the electronic signatures of the undersigned counsel are effective as if signed by hand; and

WHEREAS, the Parties met and conferred on July 9, 2020, and agree that in the interests of judicial economy, conservation of time and resources, and orderly management of this action, no Defendant shall have any obligation to respond to the Complaint until after (i) a lead plaintiff and lead counsel are appointed by the Court pursuant to the PSLRA, and (ii) the lead plaintiff identifies or files an operative complaint in this action.

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the Parties, that:

1. Defendants are not required to respond to Plaintiff's Complaint.

2. Within fourteen (14) days of the entry of an order appointing lead plaintiff and lead counsel, lead counsel and counsel for Defendants shall submit to the Court a proposed schedule for filing an amended complaint or designating the operative complaint, and briefing on any motion(s) to dismiss or response thereto.

Dated: July 22, 2020

WEISS BURKARDT KRAMER LLC

/s/ M. Janet Burkardt

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Counsel for Defendants

SO ORDERED, this __ day of _____, 2020.

Honorable J. Nicholas Ranjan